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#### UNITED STATES DISTRICT COURT

# FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2017 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM CECIL ETHERIDGE, ERNEST EDWARD DAVIS, and CHAD HENRY LOFTIN,

Defendants.

ED CR No. 17- //2

## INDICTMENT

[18 U.S.C. § 113(a)(3): Assault With a Dangerous Weapon With Intent to Do Bodily Harm; 18 U.S.C. § 113(a)(6): Assault Resulting in Serious Bodily Injury; 18 U.S.C. § 2(a): Aiding and Abetting]

The Grand Jury charges:

#### COUNT ONE

[18 U.S.C. §§ 113(a)(3); 2(a)]

On or about July 28, 2016, in San Bernardino County, within the Central District of California, and within the special maritime and territorial jurisdiction of the United States, that is, at the United States Penitentiary at Victorville, California, defendants WILLIAM CECIL ETHERIDGE and ERNEST EDWARD DAVIS, each aiding and abetting the other, intentionally assaulted victim G.A.G. with the intent to do bodily harm and, in so doing, used a dangerous weapon, namely, their

shoes and G.A.G.'s walking cane, as they assaulted victim G.A.G. by repeatedly kicking him, including in his face, head, and torso. 

### COUNT TWO

[18 U.S.C. §§ 113(a)(6), 2(a)]

On or about July 28, 2016, in San Bernardino County, within the Central District of California, and within the special territorial jurisdiction of the United States, that is, at the United States Penitentiary at Victorville, California, defendants WILLIAM CECIL ETHERIDGE and ERNEST EDWARD DAVIS, each aiding and abetting the other, intentionally assaulted victim G.A.G. by repeatedly kicking and punching him, including in his face, head, and torso, resulting in serious bodily injury.

### COUNT THREE

[18 U.S.C. §§ 113(a)(3); 2(a)]

On or about August 11, 2016, in San Bernardino County, within the Central District of California, and within the special maritime and territorial jurisdiction of the United States, that is, at the United States Penitentiary at Victorville, California, defendants WILLIAM CECIL ETHERIDGE, ERNEST EDWARD DAVIS, and CHAD HENRY LOFTIN, each aiding and abetting the other, intentionally assaulted victim W.O.A. with the intent to do bodily harm and, in so doing, used a dangerous weapon, namely, their shoes, as they assaulted victim W.O.A. by repeatedly kicking him, including in his face, head, and torso.

#### COUNT FOUR

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A. CARLEY PALMER

Assistant United States Attorney General Crimes Section

[18 U.S.C. §§ 113(a)(6), 2(a)]

On or about August 11, 2016, in San Bernardino County, within the Central District of California, and within the special territorial jurisdiction of the United States, that is, at the United States Penitentiary at Victorville, California, defendants WILLIAM CECIL ETHERIDGE, ERNEST EDWARD DAVIS, and CHAD HENRY LOFTIN, each

aiding and abetting the other, intentionally assaulted victim W.O.A.

by repeatedly kicking and hitting him, including in his face, head,

and torso, resulting in serious bodily injury.

A TRUE BILL

Foreperson

SANDRA R. BROWN Acting United States Attorney

LAWRENCE S. MIDDLETON Assistant United States Attorney Chief, Criminal Division

SCOTT M. GARRINGER

Assistant United States Attorney Deputy Chief, Criminal Division

ROBYN K. BACON

Assistant United States Attorney Deputy Chief, General Crimes Section